

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Investigation by the Department of Telecommunications and ) D.T.E. 01-20

Energy on its own Motion into the Appropriate Pricing, based )

upon Total Element Long-Run Incremental Costs, for )

Unbundled Network Elements and Combinations of Unbundled )

Network Elements, and the Appropriate Avoided Cost Discount )

for Verizon New England, Inc. d/b/a Verizon Massachusetts' )

Resale Services in the Commonwealth of Massachusetts. )

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**PETITION TO INTERVENE OF WORLDCOM, INC.**

Pursuant to 220 C.M.R. §1.03(1), WorldCom, Inc. ("WorldCom"), on behalf of itself and its affiliated entities that provide telecommunications services in Massachusetts, hereby petitions the Department of Telecommunications and Energy (the "Department") for leave to intervene as a party in this proceeding. WorldCom's principal offices are located at 500 Clinton Center Drive, Clinton, Mississippi 39056. As grounds for its Petition, WorldCom states as follows:

- Through various operating subsidiaries, WorldCom is authorized to offer domestic interstate, intrastate, local and international telecommunications services in each of the fifty states and the District of Columbia, and is a common carrier of

telecommunications services authorized by the Department to provide interLATA and intraLATA services in Massachusetts. As determined in this docket, the rates to be charged by Verizon for access to unbundled network elements, as well as for the resale of Verizon's services, will be a critical factor in determining whether WorldCom will be able to offer local exchange service to Massachusetts customers other than those served by WorldCom's own facilities.

- WorldCom has participated in other dockets of critical importance to the provision of competitive local exchange service in Massachusetts, including the *Consolidated Arbitrations* dockets, D.P.U. 96-73/73, et al., the several phases of D.T.E. 98-57, and D.T.E. 99-271. As both a customer and competitor of Verizon's, WorldCom seeks to continue to protect its interests by participating herein.
- For the foregoing reasons, and for the same reasons that it was granted leave to intervene in prior Departmental dockets relating to local competition, WorldCom will be substantially and specifically affected by the Department's review and decision in this docket.
- WorldCom intends to fully participate in the proceedings in this docket and may, as necessary, conduct discovery, present witnesses, cross-examine witnesses, present legal arguments, file briefs, etc. to protect its interests.

WHEREFORE, WorldCom respectfully requests leave to intervene in this proceeding.

Respectfully submitted,

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WORLD.COM, INC.

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Christopher J. McDonald

WorldCom, Inc.

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Christopher.McDonald@wcom.com

Dated: New York, New York

January 23, 2001

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## **APPEARANCE OF COUNSEL**

In the above-captioned proceeding, the undersigned hereby appears for and on behalf of WorldCom, Inc. and its affiliated entities that provide telecommunications services in Massachusetts.

Respectfully submitted,

WORLDCOM, INC.

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Christopher J. McDonald

WorldCom, Inc.

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New York, NY 10166

(212) 519 4164

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Dated: New York, New York

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing upon each person designated on the attached service list by email and either U.S. mail or overnight courier.

Dated: New York, New York

January 23, 2001

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